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October 9, 2019

VIA ECF

Magistrate Judge Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Letter motion for extension of time to respond to DE 16, Defendants'
Request for Pre-Motion Conference for Partial Dismissal to November 20, 2019
Galeas v. Houslanger & Associates, PLLC, et al., No. 1:19-cv-4270-PKC-RLM**

Dear Judge Chen:

This firm represents Plaintiff Ramon Galeas in the above entitled action regarding violations of the Fair Debt Collection Practices Act ("FDCPA"), N.Y. General Business Law § 349, and for conversion. Defendants in this action are a debt collection law firm Houslanger & Associates, PLLC and its principal Todd Houslanger (collectively "Houslanger") and Houslanger's debt collector client Virgo Capital, LLC ("Virgo"), the plaintiff in a state court collection lawsuit against Mr. Galeas.

On July 24, 2019, Plaintiff filed this action against Defendants. Plaintiff alleged, *inter alia*, the Defendants engaged in a four part scheme to 1) acquire for pennies on the dollar judgements they knew were likely fraudulent, resulting from false affidavits of merit and false affidavits of service; 2) commit debt collection violations in the course of collecting the fraudulent judgments; 3) attempting to wear down consumers by obtaining multiple, baseless adjournments, and 4) then attempting to dupe, and if not successful, strong-arm deceptive and unconscionable Stipulations to vacate that in fact conceal a release of potential FDCPA and other claims against the Defendants.

Plaintiff consented to two requests to by Defendants to enlarge their time to answer or otherwise move, first from August 20, 2019 to September 20, 2019 (*see* DE 14) and then from September 20, 2019 to October 4, 2019 (*see* DE 15). On October 4, 2019, Houslanger filed a letter for pre-motion conference to file a motion for partial dismissal (DE 16, "MTD Letter"). That same day, Houslanger's counsel requested a third extension for Virgo to answer or otherwise move from October 4, 2019 to November 4, 2019. The Court granted the motion.

Currently, per your individual rules (¶ 3(A)), Plaintiff's deadline to respond to the MTD Letter is October 11, 2019. As counsel for Houslanger noted in their their third request for an extension of Virgo's time to respond [DE 18], they believe the arguments in their MTD Letter "would apply to Virgo as well."

Given the apparent likelihood that Virgo will also file a letter seeking a pre-motion conference to file a motion to dismiss, and given that Virgo's deadline to answer or otherwise

move is now November 4, 2019, it would further judicial efficiency if Plaintiff were able to respond to both requests at the same time.

Therefore, Plaintiff seeks to enlarge time to November 20, 2019¹ to file an opposition to Houslanger's MTD Letter and any similar letter filed by Virgo, or to move to file an amended complaint as a matter of right pursuant to Fed.R.Civ.P. 15(a)(1)(B).

Defendant Houslanger consents to this extension. This is Plaintiff's first request for an extension.

Respectfully,

/s/

Ahmad Keshavarz

¹ The undersigned is tentatively set to take depositions the week of November 4, 2019, will be out of town most of the week of November 11, 2019 for a consumer law conference, and has additional matters scheduled in the early part of the week of November 18, 2019.